

ANGELA L. RUCKMAN,) Case No. 5:21-cv-00923-BMB
)
Plaintiff)
) Judge Bridget Meehan Brennan
vs.)
)
PHH MORTGAGE CORPORATION d/b/a PHH)
MORTGAGE SERVICING, et al.,)
)
Defendants.)
)
)

Plaintiff Angela Ruckman and Defendant PHH Mortgage Corporation d/b/a PHH Mortgage Servicing, for their Stipulation of Facts state as follows:

- 131994164v.1

8. Plaintiff made all three trial payments under the trial modification plan for the trial payments of September, October, and November of 2020.

9. On November 6, 2020, Defendant offered Plaintiff a permanent modification which included a Loan Modification Agreement.

10. To accept the Permanent Loan Modification Offer, Plaintiff was to provide payment and the executed Loan Modification Agreement to Defendant no later than November 24, 2020.

11. On November 16, 2020, Defendant also emailed Ruckman a copy of the permanent modification documents.

12. In late November, 2020, Plaintiff asked for additional time to review the modification documents.

13. On December 1, 2020, Defendant told Plaintiff that she had been granted an extension until December 31, 2020, to return the signed modification documents.

14. On March 29, 2021, Clunk Hoose filed a motion for summary judgment in the foreclosure lawsuit.

15. On May 4, 2021, Plaintiff filed this lawsuit.

16. On August 23, 2021, the loan modification was implemented.

17. On August 30, 2021, the foreclosure lawsuit was voluntarily dismissed.

18. The loan modification is still in effect and Plaintiff is current on her payments.

Dated: February 28, 2023

PHH MORTGAGE CORPORATION
d/b/a PHH MORTGAGE SERVICING

By: /s/ Simon Fleishmann (via email consent)

Simon Fleischmann
Locke Lord LLP
111 South Wacker Drive
Chicago, Illinois 60606
Telephone: (312) 443-0462
Facsimile: (312) 896-6471
sfleischmann@lockelord.com

ANGELA L. RUCKMAN

By: /s/ Daniel M. Solar

Daniel M. Solar (0085632)
Marc E. Dann (0039425)
Michael A. Smith Jr. (0097147)
Dann Law
15000 Madison Avenue
Lakewood, Ohio 44107
Telephone: (216) 373-0539
Facsimile: (216) 373-0536
notices@dannlaw.com

CERTIFICATE OF SERVICE

I certify that an exact copy of the foregoing document was electronically filed and served via the ECF system on February 28, 2023.

/s/ Daniel M. Solar

Daniel M. Solar (0085632)